IN THE DISTRICT COURT OF THE VIRGIN ISLANDS
DIVISION OF ST. THOMAS AND ST. JOHN

UNITED STATES OF AMERICA and THE PEOPLE OF THE VIRGIN ISLANDS	**I N D I C T M E N T**
	CRIMINAL NO. 2017-18
	Violations:
v.	
	Ct. 1: 18 U.S.C. § 922(o)
JOHN DOE a/k/a BENJAMIN TORRES RAMOS,	Ct. 2: 18 U.S.C. § 922(q)(3)
	Ct. 3: 18 U.S.C. § 922(q)(2)
Defendant.	Ct. 4: 14 V.I.C. § 2253(b)
	Ct. 5: 14 V.I.C. § 2253(f)

The Grand Jury charges that:

COUNT ONE

Illegal Possession of a Machine Gun

On or about August 6, 2016, at St. Thomas, in the District of the Virgin Islands and elsewhere, the defendant,

JOHN DOE a/k/a BENJAMIN TORRES RAMOS,

knowingly possess a machine gun, that is, a Glock, model 26 Gen 4, 9mm caliber pistol, serial number UYE433,

All in violation of Title 18, United States Code, Sections 922(o) and 924(a)(2).

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The Grand Jury further charges that:

COUNT TWO

Discharge of a Firearm in a School Zone

On or about August 6, 2016, at St. Thomas, in the District of the Virgin Islands, the defendant,

JOHN DOE a/k/a BENJAMIN TORRES RAMOS,

did knowingly and with reckless disregard for the safety of another discharge a firearm, that is, a Glock, model 26 Gen 4, 9mm caliber pistol, serial number UYE433, that had moved in and affected interstate commerce, within 1000 feet of the grounds of the Leonard Dober Elementary School, a place that the defendant knew and had reasonable cause to believe was a school zone.

In violation of Title 18, United States Code, Sections 922(q)(3)(A) and 924(a)(4).

The Grand Jury further charges that:

COUNT THREE

Possession of a Firearm in a School Zone

On or about August 6, 2016, at St. Thomas, in the District of the Virgin Islands, the defendant,

JOHN DOE a/k/a BENJAMIN TORRES RAMOS,

did knowingly possess a firearm, that is, a Glock, model 26 Gen 4, 9mm caliber pistol, serial number UYE433, that had moved in and affected interstate commerce, within 1000 feet of the grounds of the Leonard Dober Elementary School, a place that the defendant knew and had reasonable cause to believe was a school zone.

In violation of Title 18, United States Code, Sections 922(q)(2)(A) and 924(a)(4).

The Grand Jury further charges that:

COUNT FOUR

Unauthorized Possession of a Machine Gun

On or about August 6, 2016, at St. Thomas, in the District of the Virgin Islands, the defendant,

JOHN DOE a/k/a BENJAMIN TORRES RAMOS,

unauthorized by law, had, possessed, carried, or transported, either actually or constructively, loaded or unloaded, openly or concealed, machine gun, that is, a Glock, model 26 Gen 4, 9mm caliber pistol, serial number UYE433, firearm, as defined in Title 23, Virgin Islands Code, Section 451(d)(2) and (3).

In violation of Title 14, Virgin Islands Code Section 2253(b).

The Grand Jury further charges that:

COUNT FIVE

Possession of an Unlicensed Firearm within a 1000 feet of a School

On or about August 6, 2016, at St. Thomas, in the District of the Virgin Islands, the defendant,

JOHN DOE a/k/a BENJAMIN TORRES RAMOS,

unauthorized by law, had, bore, possessed, transported, carried, either openly or concealed on or about his person, any firearm as defined in Title 23 V.I.C. §451(d) within a 1000 feet of the real property comprising a public elementary or private school, to wit: he possessed a Glock, model 26 Gen 4, 9mm caliber pistol, serial number UYE433 that was not licensed to him, within a 1000 feet of the Leonard Dober Elementary School.

In violation of Title 14, Virgin Islands Code, Section 2253(f).

NOTICE OF FORFEITURE

18 U.S.C. § 924(d)
28 U.S.C. § 2461(c)

Upon conviction of one or more of the offenses alleged in Counts 1 through 3 of this Indictment, defendant **JOHN DOE a/k/a BENJAMIN TORRES RAMOS,** shall forfeit to the United States pursuant to 18 U.S.C. § 924(d) and 28 U.S.C. § 2461(c), all firearms and ammunition involved in the commission of the offense, including but not limited to the following:

(1) a Glock, model 26 Gen 4, 9mm caliber pistol, serial number UYE433,
(2) the associated magazine, and
(3) associated ammunition.

If any of the above-described forfeitable property, as a result of any act or omission of the defendant(s): (a) cannot be located upon the exercise of due diligence; (b) has been transferred or sold to, or deposited with, a third party; (c) has been placed beyond the jurisdiction of the court; (d) has been substantially diminished in value; or (e) has been commingled with other property which cannot be divided without difficulty; It is the intent of the United States, pursuant to 21 U.S.C. § 853(p) as incorporated by 28 U.S.C. § 2461(c), to seek forfeiture of any other property of said defendants up to the value of the forfeitable property described above.

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The Grand Jury returned a TRUE BILL

JOYCELYN HEWLETT
ACTING UNITED STATES ATTORNEY

By: ______________________________
Sigrid M. Tejo-Sprotte
Assistant United States Attorney

DISTRICT OF THE VIRGIN ISLANDS: March 16, 2017.

Returned into the District Court by Grand Jurors and filed.

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CURTIS V. GOMEZ
UNITED STATES DISTRICT JUDGE